

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: TESTOSTERONE REPLACEMENT
THERAPY PRODUCTS LIABILITY
LITIGATION

MDL No. 2545

Master Docket Case No. 1:14-cv-01748

Honorable Matthew F. Kennelly

THIS DOCUMENT RELATES TO ALL
CASES

**PLAINTIFFS' MOTION FOR SUPPLEMENTAL REQUEST FOR
INFORMATION ON CASE POOL**

The Plaintiffs' Steering Committee ("PSC") hereby moves, pursuant to Rules 26 and 37 of Federal Rules of Civil Procedure for an order compelling Defendants AbbVie Inc. and Abbott Laboratories (collectively, "AbbVie") to produce Field Contact Reports for the sales representatives calling on the prescribing doctors and to inform the PSC whether custodial files are available for the sales representatives and district managers in the pool of bellwether candidate cases. The grounds for this Motion are set forth in the Plaintiffs' Memorandum in Support of Supplemental Request for Information on Case Pool, filed contemporaneously herewith. Plaintiffs have made several unsuccessful attempts to obtain the documents requested herein. These documents are highly relevant to Plaintiffs' review of the bellwether pool, which is currently ongoing. Therefore, Plaintiffs respectfully request an expedited briefing and hearing schedule. Plaintiffs are available to argue the motion, by telephone or in person, at the Court's earliest convenience.

Dated: September 23, 2015

Respectfully submitted,

/s/ Trent B. Miracle

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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2015, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of this Court's electronic filing system. Parties may access this filing through the Court's system.

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